

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF NEW YORK

KRISTINA SARHADI,

Plaintiff,

- against -

JUSTIN CATHAL GEEVER a/k/a
JUSTIN SANE, HARDWORK
DISTRIBUTION, INC., and DOE 1,

Defendants.

Civil Action No. 1:24-cv-00031 (GLS/CFH)

**NOTICE OF HARDWORK
DISTRIBUTION, INC.'S MOTION TO
DISMISS PLAINTIFF'S FIRST
AMENDED COMPLAINT FOR
FAILURE TO STATE A CLAIM**

PLEASE TAKE NOTICE that upon the Defendant Hardwork Distribution, Inc.'s Memorandum of Law in Support of Defendant's Motion to Dismiss Pursuant to Federal Rule of Civil Procedure 12(b)(6) and upon all prior proceedings, Defendant Hardwork Distribution, Inc. will move this Court at a date and time to be established by the Court at the United States District Court, Northern District of New York, Albany, New York, for judgment pursuant to Federal Rule of Civil Procedure 12(b)(6), as is more fully set forth in Defendant Hardwork Inc.'s Memorandum of Law, Defendant is seeking the dismissal of all of Plaintiff's claims against Hardwork, Inc. in their entirety.

Dated: April 22, 2024
New York, New York

BUCHANAN INGERSOLL & ROONEY PC

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To: All Attorneys of Record (via CM/ECF)